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July 24, 2008

VIA ECFS

Ms. Marlene H. Dortch
Secretary, Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: *Ex Parte* in WC Docket No. 07-243, *Telephone Number Requirements for IP-Enabled Services Providers*; WC Docket No. 07-244, *Local Number Portability Porting Interval and Validation Requirements*; WC Docket No. 04-36, *IP-Enabled Services*; CC Docket 95-116, *Telephone Number Portability*; CC Docket No. 99-200, *Numbering Resource Optimization*

Dear Ms. Dortch:

This *ex parte* letter is submitted on behalf of One Communications Corp. ("One Communications") in the above-referenced proceedings with respect to continuing consideration of wireline-to-wireline and intermodal porting intervals. As One Communications has explained in prior comments and as recent *ex parte* filings confirm, the effort to shorten the interval for simple port requests should not be taken lightly without due consideration of the relative benefits and costs — which costs include potentially customer service-affecting technical and operational concerns. Moreover, to allow the industry to assess the full implications of expediting the interval, the Commission should clarify its current requirements with respect to validation and accomplishment of simple port requests by ruling on the pending Petition for Clarification filed by One Communications *before* reaching any decision with respect to shortening of the porting interval.

First, One Communications agrees in part with a July 1, 2008 *ex parte* presentation of the United States Telecom Association ("USTelecom") regarding the need for assessment of the costs and benefits of a shortened interval for simple port requests. In particular, USTelecom notes (at page 4) the potential for customer harm if "accuracy is sacrificed to speed" in processing ports. A recent survey conducted by Verizon shows that consumers value landline services for their safety, quality, and reliability. (A copy of Verizon's press release regarding this survey is enclosed with this letter.) Eighty-three percent of survey respondents (74 percent of which also had a

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wireless phone) intend to continue using their landline home phone indefinitely. Ninety-four percent of the respondents cited reliability and 91 percent cited safety as the key factors for retaining landline service. It would directly contradict the preferences and desires of the vast majority of customers if an unduly shortened porting interval led to service disruptions, lower reliability of service, and concerns about safety. Movement to an expedited interval may only undermine customer confidence in wireline services and create delay, confusion, and disruption in the end, as the race to effectuate ports within a mandated shorter period results in more errors in processing and greater “fall out” of port requests. In short, the vast majority of customers do not view wireless service as a substitute for safe, reliable wireline service. The Commission should not shorten the wireline porting interval so as to make it look more like the wireless interval if the result would be increased errors, increased service disruptions, and decreased reliability.

The Commission, therefore, should proceed carefully and examine the entire porting process to avoid unintended adverse consequences in moving to an expedited porting interval. In addition to carriers’ individual systems changes, as noted in One Communications’ prior comments, existing industry guidelines and processes would require substantial revision to accommodate a 48-hour porting interval. (For example, at least 18 hours of the porting process are absorbed by NPAC timers over which individual carriers have no control.) It is critical that such industry-wide change not be implemented overnight pursuant to regulatory edict. If the Commission were to mandate a shorter interval (which it should not), a phase-in period as discussed by One Communications and as supported by USTelecom in its recent *ex parte* letter (at 7-8) would be appropriate. *See also* Comments of RCN Telecom Services, Inc. at 4-5; Comments of the Alliance for Telecommunications Industry Solutions at 1 and 6 (urging careful consideration of the impact of new porting rules given “the inherent complexity of the porting process”); Reply Comments of AT&T Inc. at 3.

Finally, USTelecom’s recent *ex parte* presentation references and highlights the need for action on the Petition for Clarification filed by One Communications regarding the distinction between *validation* and *accomplishment* of port requests. There has been significant focus on the “four field” validation requirement adopted by the Commission, and the fact that this should ostensibly help in speeding up the porting process. As the Petition of One Communications makes clear, however, *validation* is but one part of the porting process, and having only recently been adopted, it is not yet clear whether this narrowed validation requirement will in fact assist in expediting the porting process. Thus, as USTelecom notes (at page 4), “it is unsettled whether this rule can be implemented as it stands and how it will operate in practice” and until such questions are resolved, “it will be impossible to determine what effects the declaratory ruling will have on the porting interval.” Accordingly, the Commission should clarify first the scope of the validation requirement and its relationship to accomplishment of a simple port by ruling on the One Communications Petition *before* reaching any further determinations with respect to the interval applicable to such ports.

The ultimate goal in number porting is a seamless port that is transparent to the consumer, with no disruption or degradation in service. Although a shorter porting interval may be a desirable objective in the abstract, it should not be compelled without

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adequate consideration of the costs, benefits, and technical and operational concerns necessary to implement it, clarification of what precisely needs to be achieved and exchanged between carriers during such an interval, and the resulting impacts on end users. Thus, the Commission should avoid a rush to judgment on a 48-hour porting interval, and should instead proceed carefully by examining in detail the existing porting process – and the changes that must be made to it by individual carriers and the industry as a whole to avoid doing harm to the customer – before reaching any final determination.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ron DelSesto', with a stylized flourish at the end.

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Enclosure


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News Release

New Survey Shows 83 Percent of Consumers Continue to Rely on Landline Voice Service for Its Quality, Safety Features

Verizon Survey Shows Vast Majority Plan to Retain Their Home Phone Service Indefinitely

March 27, 2008

Media Contact:
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NEW YORK - American consumers have a wide array of choices for personal communication services, but, when it comes to their home, an overwhelming majority - including those who have a cell phone - say they plan to keep and continue using their landline home phone indefinitely. Most often the service's proven reliability and safety were given as reasons in a new nationwide survey commissioned by Verizon.

The telephone survey, conducted by KRC Research last month, polled more than 800 consumers aged 18 and over who pay their landline phone bill. It found that:

- Eighty-three percent of the respondents intend to continue using their landline home phone indefinitely - a strong vote of consumer confidence for landline voice service in a survey group that included a large number of participants who also have a cell phone (74 percent).
- Ninety-four percent of the respondents cited reliability and 91 percent cited safety as the key factors for retaining landline service.
- Seventy-six percent of landline phone owners use their landline phone every day.

(Note: Downloadable graphics that illustrate key points of the survey are available at <http://verizon.wieck.com/>.)

"These survey results underscore the reasons why we have a large and loyal base of home phone customers," said Virginia Ruesterholz, Verizon Telecom president. "Of course, Verizon offers a tremendous cell phone service too, and these consumers see their wireline phone as a critically important phone in their homes.

"For decades, the landline home phone has set the standard for unmatched performance and consistent communications quality. The day-in, day-out dependability of Verizon's landline voice service gives customers a deep sense of comfort, so they maintain a strong commitment to their landline home phone," said Ruesterholz.

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Verizon's landline network processes more than 1 billion calls a day, with 99.9 percent reliability.

Consumers Value Voice Quality, Reliability and Consistency of Service

Reflecting the significant amount of technological improvements and preventive maintenance that Verizon routinely performs on its landline network, 92 percent of respondents said they are satisfied with their landline phone service.

Ninety-eight percent of landline users consider their connection to be reliable on a typical day, and 91 percent rate their connection as reliable even on days when the weather is inclement. In 2007, Verizon invested \$11 billion in its landline network, and has pumped \$43.4 billion into its landline network over the past five years.

Not surprisingly, nearly 100 percent of those surveyed said voice quality - audio volume, voice clarity and tone - is important when making phone calls, and eight of 10 landline owners said voice quality is very important.

Survey respondents included users of many different cell phone services. Three-quarters (74 percent) said their landline home phone trumped their mobile phone in terms of voice quality, reliability and consistency of service.

Landline Loyalty Key to Verizon Bundling Strategy

In order to realize the most value for their spending, nearly two-thirds of consumers - including people who live in urban areas, younger adults and those who earn more than \$75,000 annually - say they would consider bundling their landline home phone with television, Internet services and wireless plans. In fact, those who have both a landline and cellular phone are more likely than those without a cellular phone to bundle their communication services, the survey found.

"Deepening further the loyalty of our existing base of landline phone customers is essential to our bundling strategy, which seeks to deliver an array of top-quality services at value-based prices," said Marilyn O'Connell, Verizon Telecom chief marketing officer. "These bundles are popular with consumers who believe that cable competitors can't offer the same level of reliability as we do with the traditional Verizon home phone service."

Verizon offers competitive pricing on bundles of broadband and entertainment services including its High Speed Internet service, FiOS Internet and FiOS TV, along with a convenient billing option for Verizon Wireless customers. By year-end 2007, bundled services continued to attract and retain Verizon customers, with more than half of all new customers choosing a bundle.

Dependability a key quality of traditional service

Nearly half of the landline phone owners surveyed said they would feel unsafe if their home did not have a landline connection, reflecting the importance of having a phone they know will be ready to dial at a moment's notice.

Typical reasons those surveyed gave for staying true to their landline home phone include: "My telephone line is my lifeline." "That's the one I use the most and it doesn't have to be recharged." "It's most ready in case of an emergency." "It gives me security that I can reach 911." "When the electricity goes out I can still use the landline phone." And, "I can depend on it 24 hours a day, 365 days a year."

The survey revealed that women, senior citizens, middle-income earners (\$50,000 to \$75,000 annually) and those living outside of metropolitan areas are more likely to continue using their landline phones indefinitely.

Eighty-eight percent of respondents in the survey said they owned cordless landline phones; 61 percent own a corded landline phone; and 49 percent own both types. Consumers who use only a traditional corded phone in their residence are more likely than those with only a cordless phone to want to keep their phone indefinitely, and they could not imagine living without their landline phone, according to the survey.

Eighty-seven percent of females, versus 80 percent of males, plan to continue using their landline phone for the foreseeable future, whereas 90 percent of persons older than 65 said they will keep their landline phone forever as opposed to 82 percent of those under the age of 65.

Verizon Communications Inc. (NYSE:VZ), headquartered in New York, is a leader in delivering broadband and other wireline and wireless communication innovations to mass market, business, government and wholesale customers. Verizon Wireless operates America's most reliable wireless network, serving nearly 66 million customers nationwide. Verizon's Wireline operations include Verizon Business, which delivers innovative and seamless business solutions to customers around the world, and Verizon Telecom, which brings customers the benefits of converged communications, information and entertainment services over the nation's most advanced fiber-optic network. A Dow 30 company, Verizon employs a diverse workforce of nearly 235,000 and last year generated consolidated operating revenues of \$93.5 billion. For more information, visit www.verizon.com.

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